

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT TENNESSEE
NASHVILLE DIVISION

TENNESSEE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
on behalf of itself and its
members, et al.,

Plaintiffs Civil Action No. 3:20-cv-01039
JUDGE CAMPBELL
vs. MAGISTRATE JUDGE FRENSLEY

WILLIAM LEE, in his official
capacity as Governor of the
State of Tennessee, et al.,

Defendant

VOLUME I

DEPOSITION OF:

MARK GOINS

Taken on behalf of the Plaintiffs

Thursday, December 14, 2023

1:48 p.m.

BERES & ASSOCIATES COURT REPORTERS
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1 escalated it to the level we've escalated it.

2 This was a discussion --

3 I don't know. There's been a number of
4 issues -- there's been a number of meetings with my
5 counsel and the Attorney General counsel. It's also
6 the counsel -- and I don't know which meeting that that
7 was brought up. It's been brought up in more than one,
8 but I can't recall the timing.

9 Q. Okay. Do you remember when that application
10 came in?

11 A. I don't.

12 Q. Are there more than one application that are
13 presenting these sort of tricky questions around what
14 full citizenship restoration is?

15 A. I think -- I don't know. I think this is the
16 issue right now that --

17 To my knowledge, this is the issue that we
18 are discussing.

19 Q. Have you requested a formal Attorney
20 General's opinion?

21 A. I have been in -- no.

22 Q. Is that a hard question to answer?

23 A. I have escalated it -- well, so you kind of
24 get into the informal versus formal again.

25 Q. Well, I asked if you had requested a formal

1 opinion.

2 A. Right. And I was thinking through the
3 question you asked. And that was the delay.

4 Q. But the answer is no?

5 A. As we set here today, the answer is no.

6 Q. Are you going to?

7 A. Probably.

8 Q. When did you decide that?

9 A. Probably a week and a half ago. Well, so
10 didn't decide that a week and a half ago. Escalated
11 the discussions. So there's more counsel -- you know,
12 there's other individuals at the Attorney General
13 office that -- we have -- there's other people that's
14 aware that we are asking this question so -- counsel.
15 They're all attorneys.

16 Q. Okay. But are you talking about counsel
17 outside of the Attorney General's office?

18 A. No. No, no, no. Well, either Secretary of --
19 the folks at Secretary of State, the counsel there --
20 I'm not saying anyone outside of the realm of folks
21 that discuss this with myself.

22 This is tricky because you are getting into
23 discussions I've had with counsel over the issue that --

24 So a week and a half ago, it has been -- or
25 maybe two weeks ago, it became an option to potentially

1 can't get their firearm.

2 No, I can't say yes because --

3 Okay. The question has to be answered. So
4 if the answer -- which this is a big if. If the answer
5 is that gun rights does equal full citizenship rights
6 and someone is permanently not able to get those back,
7 then I think you're correct. I think you have to get
8 an expungement or exoneration in that instance.

9 Q. Okay. And assuming, since you said you don't
10 know, that there are also Tennessee laws that
11 permanently prevent people with certain types of
12 conviction from getting their firearms rights restored,
13 those people would also be permanently disqualified
14 from voting, barring exoneration or expungement?

15 A. I believe that to be the case.

16 Q. Okay. So that interpretation of full rights
17 of citizenship would effectively expand the list of
18 permanently disqualifying convictions?

19 A. I don't -- I've not done an -- I've not --

20 I don't know how much it would expand it
21 because I would think that a lot of the permanent
22 disqualifying felonies, typically they're violent,
23 other than the ones that deal with voter fraud and
24 something in your official capacity. Probably a lot of
25 those individuals are losing their gun rights anyways.

C E R T I F I C A T E

I, Virginia Dodge, Registered Diplomate Reporter and Tennessee Licensed Court Reporter and Notary Public, do hereby certify that I recorded to the best of my skill and ability by machine shorthand the deposition contained herein, that same was reduced to computer transcription by myself, and that the foregoing is a true, accurate and complete transcript of the deposition testimony heard in this cause.

I further certify that the witness was first duly sworn by me and that I am not an attorney or counsel of any of the parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

This 2nd day of January, 2024.



Virginia Dodge
My Commission Expires: 8/23/2026
Tennessee LCR No. 734, Exp: 6/30/24
Tennessee CCR No. 0499, Exp: 6/30/24
RDR/CRR #835835

